

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____
v. : DATE FILED: _____
TUNG PHUNG : VIOLATIONS:
: 21 U.S.C. § 841(a)(1)
: (distribution of MDMA - 1
count)
: 21 U.S.C. § 952(a)
: (importation of MDMA - 1
count)
: 21 U.S.C. § 841(a)(1)
: (distribution of marijuana
- 1 count)
: 21 U.S.C. § 952(a)
: (importation of marijuana -
1 count

: 18 U.S.C. § 2
: (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about July 27, 2005, in Jenkintown, in the Eastern District of Pennsylvania, and elsewhere, defendant

TUNG PHUNG

knowingly and intentionally distributed 1998 tablets, with a net weight of approximately 504 grams, of a mixture and substance containing a detectable amount of methylenedioxy methamphetamine ("MDMA"), a Schedule I controlled substance.

In violation of Title 21, United States Code,
Section 841(a)(1), (b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 27, 2005, in Jenkintown, in the Eastern District of Pennsylvania, and elsewhere, defendant

TUNG PHUNG

knowingly and intentionally imported, and aided and abetted the importation of, approximately 1998 pills, with a net weight of approximately 504 grams, of a mixture and substance containing a detectable amount of methylenedioxy methamphetamine ("MDMA"), a Schedule I controlled substance, into the United States from a place outside the United States, that is, Canada.

In violation of Title 21, United States Code, Sections 952(a), 960(a), 960(b)(3), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 27, 2005, in Jenkintown, in the Eastern District of Pennsylvania, and elsewhere, defendant

TUNG PHUNG

knowingly and intentionally distributed for remuneration approximately 961 grams of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 27, 2005, in Jenkintown, in the Eastern District of Pennsylvania, and elsewhere, defendant

TUNG PHUNG

knowingly and intentionally imported, and aided and abetted the importation of, approximately 961 grams of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, into the United States from a place outside the United States, that is, Canada.

In violation of Title 21, United States Code, Sections 952(a) 960(a)(1), and 960(b)(4), and Title 18, United States Code, Section 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney